I believe that BPL service would be very much more destructive to licensed radio services in the HF radio spectrum as compared to traditional carrier current systems.

I am very much opposed to the expansion of HF RF communications services over power lines for "last mile", purposes. The core purpose of connecting data service points via any form of ransmission line is to isolate them from an ability to either cause interference to another valid service, or for any other valid service to cause interference with them.

This proposed HF RF service does not belong in any way in an environment in which it can either reasonably escape into other valid HF services nor have other HF broadcast services reasonably enter into its domain. A single open wire transmission line or even medium voltage phased lines used for this proposed service violates every form of engineering protective covenant both ways in the HF spectrum area that I can visualize. That belief stems from nearly fifty years of experience as an amateur radio operator (Extra Class since the mid-50's), a First Class Phone FCC license, First Class Telegraph FCC license and finally, as a Narte Master Telecommunications Engineer.

Looking back over nearly 5 decades of life at this, I think by far the most obnoxious problems I've faced were dealing with interference of one form or another between services. I believe this service will create major problems both to and from this proposed service with this proposed technology. I don't think for one minute that the level of RF radiation proposed as "acceptable" at the distances proposed from a power line is acceptable at all. It isn't, as I've seen all this for decades.

HF services travel world wide, far more easily than most people suspect at frequencies above the 3 Mhz mark. Too often, in the case of ionospheric reflected RF service, the difference between success and failure, actually life and death in certain cases, is measured in picking out the required data in terms of only a few microvolts or so per meter just above the noise, from what's already there today as it is. And don't for one minute think power lines won't both radiate this stuff ... and ... pick up other stuff inbound as well. You think 802.11 is bad now? Just wait for what neat stuff one can concoct to poke into this game via HF at this! And the last thing we need in an increasing age of terroristic threat, is a simple open
antenna way to couple nasties into core technologies, which I believe this could open up.

Remember, just because you propound one can absolutely guarantee an adequate level from point "A" to point "B" along the wire, or fifty feet from it, perhaps; service levels you contemplate adequate for this service are perhaps orders of magnitude above what existing radiant mode operations must work with now, day in and day out, on these same frequencies even in the same building with them. Even very low levels of energy travel huge distances easily and tracing them or dealing with them as skip enabled issues will be an unholy nightmare. This isn't just a ham radio issue either. It permeates all kinds of intelligence service work for many other existing services as well.

To compound the problem, it is one thing to provide for a process by which a valid HF user could complain to an interfering power line source from BPL as it is now proposed. But a proper complaint must also be specific as to identification of the signature of the offending signal as well, more than just an, "I heard it!", comment. There is, as the proposed BPL standard that I have seen reflects, no practical way to get a proper signature for a complaint to

either the offending source, nor to the FCC! Remember, at HF, this is not only a local issue, but a skip issue.

If BPL is permitted, it should be manatory that all BPL sources be required to provide an easy way to identify the source of the signal, such that a cheap, easy interference monitor device can absolutely prove that a given source is causing interference, and, upon which that source must immediately terminate the interference pending a more formal resolution and correction of it before the BPL operation can be resumed. In the interest of National security alone, we simply cannot afford to let any power company avoid taking action when confronted with clear and accurate evidence of it. The proposed BPL operations simply have to provide a way for that to be done in my humble opinion.

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